In RE: Petition for
Declaratory Ruling Filed By:
Barbara J. Allen, R.N.
November 8, 1994

RN Delegation to Nonlicensed
Health Care Associates, Administration of Rectal Diazepam
(Valium) to Students in the
School When the Students
Demonstrate Seizure Activity

A petition for declaratory ruling was filed with the Iowa Board of Nursing by Barbara J. Allen, R.N., Johnston, Iowa, on November 8, 1994.

The Board is authorized to issue declaratory rulings "as to the applicability of any statutory provision, rule, or other written statement of law or policy, decision, or order of the agency" pursuant to Iowa Code § 17A.9 (1993). See also 655 IAC 9.

The question presented in this petition is:

May a registered nurse employed by a school district delegate the responsibility for administering doses of diazepam (Valium) rectally as needed for seizure activity?

The Board's interpretation of the question is:

May a registered nurse employed by a school district delegate to nonlicensed health care associates, administration of rectal diazepam (Valium) to students in the school when the students demonstrate seizure activity?

The facts leading to this case are as follows:

The school district for which this nurse is employed serves 2800 students in four buildings. Two registered nurses are employed by the district to serve all four schools. Each RN is assigned to two schools, spending one-half day in each school

building. Each building employs a nonlicensed health associate to cover the health office when the RN is not in the building.

In the building in question there are 930 students and eleven students who are residents of a residential care facility for the mentally retarded. This facility serves children at three levels: skilled nursing care, intermediate care and alternative living environments.

Three students who range in age from ten to thirteen have orders for injectable diazepam to be given rectally at various doses for seizure activity. An injectable form which must be prepared at the time of administration is given per rectal tube. Dosages range from 5 to 10 milligrams.

Each student has seizure activity which is unique to that student alone. The teachers in the classroom are responsible for recording seizure activity and are responsible for calling the school nurse if they feel the student's seizure activity is reaching the level necessary to consider giving the rectal doses of medication. The nurse is responsible for assessing the student and making the decision to administer the medication in order to prevent serious or permanent damage resulting from the seizure. It is extremely important to make the proper assessment and nursing judgment in order to determine whether or not the medication should be given. Because each child's seizure activities are unique, the decision-making process is particularly complex. At times, the school nurse finds it necessary to consult, by telephone, the nurse at the skilled

nursing care facility in order to make the decision. The school nurse has been called by teachers three times since the beginning of this academic year. Twice administration of the medication has been necessary; once it was not. The Director of Nursing at the home where the children reside reports that some of the children have seizure activity almost daily, but at times the seizure activity does not warrant medication administration. She reports that it has not been necessary to administer the medication in the past six months. She also reports that in the facility where she is employed only an RN or LPN is allowed to administer the medication. To administer the medication, the correct dose must be transferred from a pre-filled disposable syringe into an asepto syringe and then administered through a piece of rubber tubing. If stool is present, it must be removed prior to medication administration. Depending on the type of seizure activity the child demonstrates, rectal administration may be difficult. After the medication is administered, the nurse must remain with the student to monitor vital signs, observe for the effectiveness of the medication and watch the student for adverse effects. If the medication is not effective, the physician must be notified and further treatment such as additional medication, oxygen therapy and possible emergency transport may be necessary. When administered rectally, the medication is fast acting and the person administering it must be prepared to observe for side effects affecting the cardiovascular and respiratory systems. If administered unnecessarily, the

child's learning opportunities are compromised due to the central nervous system effects of the medication.

Rationale:

The Board of nursing considers the administration of rectal diazepam (Valium) to be a nursing function. The assessments and skills requires the knowledge base attributed to the nurse.

Nonlicensed personnel are not educated to make the assessments or nursing judgements required in this case.

655 IAC 6.2(2) 6.2 states:

- 6.2(2) The registered nurse shall utilize the nursing process in the practice of nursing, consistent with accepted and prevailing practice. The nursing process includes:
- a. Nursing assessments about the health status of the patient/client, analysis of the data and formulation of a nursing diagnosis.
- b. Planning of nursing care which includes determining goals and priorities for actions which are based on the nursing diagnosis.
- Nursing interventions implementing the plan of care.
- d. Evaluation of patient/client status in relation to established goals and the plan of care.
- e. Paragraphs "a" through "d" recurring throughout the nursing process.

Furthermore, according to the <u>Concept Paper on Delegation</u>
from the National Council of State Boards of Nursing, Inc., which
was endorsed by the Towa Board of Nursing on December 7, 1990,
the functions of assessment, evaluation and nursing judgement
should not be delegated. The assessment skills required in this
situation are particularly complex since each child has his/her
own unique pattern of seizure activity. The potential for harm

is high since a possible outcome is cardiovascular or respiratory depression. An additional risk factor is the unpredictability of the outcome. Finally, the complexity of the task is high since the medication cannot be prepared in advance; a medication manufactured for injectable use must be prepared for rectal administration; at times removal of a fecal impaction must be accomplished prior to medication administration; a rectal tube must be inserted during the time of seizure activity, a potentially difficult task for even an experienced practitioner; and if the seizure activity is not controlled by the medication, further treatment is necessary.

Based on the above, the Iowa Board of Nursing considers RN delegation of administration of rectal diazepam (Valium) to a child in the school setting during seizure activity to nonlicensed to health care associate inappropriate.

Knutstrom, R.N.,

December 1, 1994

Chairperson

Iowa Board of Nursing

December 1, 1994

Date

Executive Director Iowa Board of Nursing